

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

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*ATTORNEYS FOR DEBTOR*

In re:

LTL MANAGEMENT LLC,<sup>1</sup>

Debtor.

Chapter 11

Case No.: 21-30589 (MBK)

Judge: Michael B. Kaplan

**Hearing Date and Time:**

July 6, 2022 at 10:00 a.m.

**NOTICE OF DEBTOR'S SECOND MOTION FOR ENTRY  
OF AN ORDER EXTENDING THE PERIOD WITHIN WHICH THE  
DEBTOR MAY REMOVE ACTIONS PURSUANT TO 28 U.S.C. § 1452  
AND RULE 9027 OF THE FEDERAL RULES OF BANKRUPTCY PROCEDURE**

**PLEASE TAKE NOTICE** that, on July 6, 2022 at 10:00 a.m., or as soon

thereafter as counsel may be heard, LTL Management LLC, the above-captioned debtor

<sup>1</sup> The last four digits of the Debtor's taxpayer identification number are 6622. The Debtor's address is 501 George Street, New Brunswick, New Jersey 08933.

(the “Debtor”), by and through its counsel, shall move before the Honorable Michael B. Kaplan, United States Bankruptcy Judge, at the United States Bankruptcy Court, Clarkson S. Fisher U.S. Courthouse, 402 East State Street, Trenton, New Jersey 08608, for the entry of an order, pursuant to Rule 9006(b) of the Federal Rules of Bankruptcy Procedure, extending the period within which the Debtor may remove actions pursuant to 28 U.S.C. § 1452 and Bankruptcy Rule 9027 through and including January 9, 2023 (the “Motion”).

**PLEASE TAKE FURTHER NOTICE** that, pursuant to D.N.J. LBR 9013-2, responsive papers, if any, must be filed with the Clerk of the Bankruptcy Court, Clarkson S. Fisher Courthouse, 402 East State Street, Trenton, New Jersey 08608, and served upon (a) the Debtor’s undersigned counsel, (b) counsel to the Official Committee of Talc Claimants, (c) the Future Claimants’ Representative and her counsel, (d) the Fee Examiner and his counsel, (e) the Office of the United States Trustee for the District of New Jersey and (f) any other party entitled to notice no later than seven (7) days prior to the hearing.

**PLEASE TAKE FURTHER NOTICE** that, unless an objection is timely filed and served, the Motion will be deemed uncontested in accordance with D.N.J. LBR 9013-3(d) and the relief may be granted without a hearing.

Dated: June 15, 2022

**WOLLMUTH MAHER & DEUTSCH LLP**

/s/ Paul R. DeFilippo

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